

Geosafe

Corporation

GECSF
57.1
12/11/90

Kirkland Parkplace
303 Parkplace, Suite 126
Kirkland, Washington 98033
(206) 822-4000
Fax: (206) 827-6608

December 11, 1990

Exposure Evaluation Division
United States Environmental Protection Agency
Office of Pesticides and Toxic Substances
401 M Street SW
Washington, D.C. 20460

ATTN: Joseph J. Merenda, Director

RE: SUBMITTAL OF ADDITIONAL INFORMATION REQUIRED AS PART OF PERMIT
TO DEMONSTRATE PCB ALTERNATE THERMAL DISPOSAL METHOD

Dear Mr. Merenda:

Confirming our recent telephone discussions with Mr. Hiroshi Dodohara, we are submitting additional information necessary for the completion of the actions required to resolve the list of deficiencies identified in your approval letter dated August 2, 1990. The following documents are attached:

- Geosafe Maintenance Instruction, Revision -0-, and all Geosafe Preventive Maintenance Standards applicable to the ISV equipment;
- Geosafe Corporation Health and Safety Plan for the TSCA Demonstration Test at the General Electric Site, Spokane, Washington, dated December 4, 1990;
- resumes for all Geosafe Corporation project personnel; and
- an updated Demonstration Test Schedule.

As noted in the attached schedule, the Demonstration Test Plan will be updated to incorporate all required modifications and will be submitted by January 2, 1990. Changes include the addition of a third test layer in Melt 2, covered by 2 feet of clean soil, as suggested by Mr. Dodohara, and test duration has been extended accordingly from 170 to 240 hours. We assume that since they were submitted over 30 days prior to the start of testing activities, all analytical procedures submitted by our letter of October 10, 1990 may be considered to be approved.

We anticipate providing formal 30 day notification to the EPA Region X Administrator and all appropriate State and local officials on January 4, 1990. Schedule slippage is due to

USEPA SF



1435833

unforeseen delays in the delivery of our off gas hood fabric; our supplier's delivery commitments on DOD contracts for Operation Desert Shield have taken precedence. We have discussed detailed schedule considerations with Mr. Dodohara in order to permit his advance planning for witnessing significant portions of the demonstration test. EPA inspection activities are welcomed at any time; however, based on our reading of permit Condition 21, we feel that it is important to address several considerations that must be observed in the coordination of such activities. Because of the overall technical complexity of the demonstration test, the limited number of technical staff onsite, the specific training requirements of the site operator's health and safety plan, and our own concerns for protecting the health and safety of our operators, other site personnel, and the public, all site visits must be coordinated in advance through the Geosafe Site Manager and myself. All EPA representatives must be escorted by the Site Manager or his designee whenever onsite; any actions that may be taken by EPA representatives pursuant to Condition 21 during a site visit must be coordinated through the Site Manager and may not compromise technical activities in process or the safe operation of the process equipment. We are certain that you share our concerns for safety and for the achievement of the goals of the demonstration test. Please be assured that with proper coordination, we can accomodate your specific inspection needs without untowardly affecting technical activities.

We trust that these documents will meet your needs, and look forward to the successful completion of the demonstration test and our continued cooperation with EPA representatives. If you should have any questions or require further efforts on our part, please contact the undersigned at your earliest convenience.

Sincerely,
GEOSAFE CORPORATION



Glenn Mills
Director of Regulatory Affairs

Attachments

cc: D. Hankins (GE)
H. Dodohara (EPA-HQ/OTS), with attachments
D. Rasmussen, Regional Administrator (EPA-Region X)
B. Ewy (Ecology)
S. FitzPatrick (STEP 1)
V. FitzPatrick (Geosafe)
B. Johnson (Geosafe)
R. Stenzel (Bechtel Environmental)